



The WALT DISNEY Company

Susan L. Fox  
Vice President  
Government Relations

February 13, 2012

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20024

RE: Notice of Ex Parte Communication  
MB Docket Nos. 00-168 and 00-44

Dear Ms. Dortch:

On Thursday, February 9, 2012, Alan Braverman (Senior EVP, General Counsel and Secretary), Richard Bates (SVP, Government Relations), and Susan Fox (VP, Government Relations), all of The Walt Disney Company, met with Zach Katz, Chief of Staff to Chairman Julius Genachowski. During that meeting, the undersigned noted that, while we support putting most of broadcasters' current public files online, placing the entire political file online on an immediate basis raises significant concerns.

Specifically, Ms. Fox noted the logistics and burden involved in such a requirement, as well as the potential anticompetitive effect of making individual advertising rates information available online where competitors in the market and commercial advertisers may anonymously glean highly sensitive pricing data, which, by law, will represent the lowest rates charged by the station to its most favored commercial advertisers. Ms. Fox also pointed to the suggestion in the joint comments that we can continue to make "dates and dollars" information available over the phone to political time buyers, and are open to discussing other options for meeting legitimate government interests without creating negative consequences.

This letter is being submitted electronically in the above-referenced docket, which has been granted permit-but-disclose status, pursuant to Section 1.1206(b) of the Commission's Rules. Should you have any questions concerning this submission, kindly contact the undersigned.

Respectfully submitted,

Susan Fox  
Vice President, Government Relations  
The Walt Disney Company

cc: Zach Katz